

92 RF 2212

# **EG&G ROCKY FLATS**

EG&G ROCKY FLATS, INC.  
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March 13, 1992

92-RF-2212

Robert M. Nelson, Jr.  
Manager  
DOE, RFO

Attn: S. R. Grace, F. R. Lockhart

REQUEST FOR EXTENSION OF OU 1 IAG SCHEDULE FOR REMEDIAL INVESTIGATION -  
JMK-0178-92

EG&G Rocky Flats, Inc. (EG&G) would like to request that the Department of Energy (DOE) petition the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) for an extension of 160 working days on the Interagency Agreement (IAG) schedule for submittal of the Operable Unit No. 1 (OU 1), 881 Hillside Remedial Investigation (RI) report.

The technical basis for the extension request is two-fold. As we have discussed with both DOE staff and agency staff over the last few months, the problems compiling the data set have severely compromised our schedule, now to the point of not being able to meet the IAG milestone. First, the laboratories receiving our samples have not been able to meet their contractually committed sample turnaround schedule for radionuclide analysis. The laboratory results are being returned to EG&G in approximately twice the time frame of the 63 working days assumed in the IAG (page 6, IAG General Assumptions). The Rocky Flats Environmental Database System (RFEDS) input and the independent validation process for data is occurring in about 100 working days, more than 5 times the IAG-assumed time frame of 21 working days (page 7, IAG Assumptions). To clearly illustrate the problem, Table 1 (attached) is a short list of representative samples from the OU 1 RI project with their shipping dates and the dates the laboratory results arrived at EG&G. Attachment 2 is a letter from one of our contract laboratories documenting the turnaround problem from the contract laboratory viewpoint.

The notable impact of this laboratory turnaround problem is that the data generated by the OU 1 field program is not available in a time frame that can accommodate the IAG schedule, despite the fact that the work was completed on time. The IAG milestone for completion of field activities was December 18, 1991. EG&G met this milestone. However, based on the actual laboratory turnaround times, the data generated at the end of the field program will not arrive at EG&G until June. The validation process can then begin, making the final data available in October. The RI report is scheduled for submittal to EPA and CDH on July 31, 1992.

ST.	LTR	CNC
BENJAMIN, A.		
BERMAN, H.S.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, R.D.		
CRUCHER, D.W.		
DAVIS, J.G.		
DERED, J.E.	X	
ERRERA, D.W.		
RANCIS, G.E.		
OODWIN, R.		
IANNI, B.J.		
ARMAN, I. K.		
EALY, T.J.		
EKER, E.H.		
ENS, J.P.		
ERSH, J.M.	X	
IRBY, W.A.		
UESTER, A.W.		
RLEG, D.		
EE, E.M.	X	
AJESTIC, J.R.		
ARX, G.E.		
EURRENS, B.E.		
ORGAN, R.V.	X	
OTTER, G.L.	X	
ZZUTO, V.M.		
AEELLI, B.F.		
ANDLIN, N.B.		
HEPLER, I.B.		
WANSON, E.R.		
IEBE, J.S.		
ILKIN, R.B.	X	
ILS, M.		
OUN, R.		
WE, J.O.		
hloff, F.H.	X	
ennedy, C.E.	X	
amison, E.A.	X	
re, C.B.	X	
age, P.S.	X	
WM Track, G.X		
RRRES CONTROL	x	x
AFFIC		

## CLASSIFICATION:

ICNI	
NCLASSIFIED	X
ONFIDENTIAL	
ECRET	

THORIZED CLASSIFIER  
SIGNATURE

DATE

REPRODUCTION LTR NO.

APPROVALS:

EG&G TYPYST INITIALS

ADMIN RECORD

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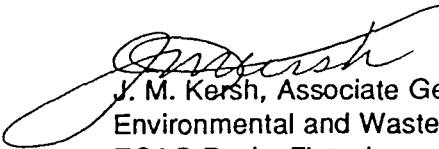
The second aspect of the request for extension is based specifically on the groundwater data. EG&G successfully completed installation, development and sampling of the Phase III wells within the IAG schedule for the field work. A second quarter of data from all these wells is considered essential to technically support the interpretation of the groundwater system.

Industry standard and good technical practice is to receive at least one confirmation round of analyses for new groundwater wells after the initial sampling. Collection of this second quarter of data was begun as soon as the first quarter ended, February 1, 1992. Based on the previously discussed laboratory turnaround times, the second quarter data will not be returned to EG&G until June 1992. Validated data will not be available until October 1992 at the earliest. If EPA and CDH does not feel this second quarter data is essential, we will proceed with the initial sampling data only.

An extension of 160 working days will allow EG&G to complete the draft RI report by January 30, 1993. That is a realistic schedule for submittal of a quality document based on data availability. Under the existing situation, submittal of a draft RI report before January 30, 1992 will likely result in a substandard report that may not be acceptable to EPA and CDH, resulting in extensive comments and revisions.

EG&G requests that DOE pursue this request with EPA and CDH expeditiously. EG&G will continue to diligently work on the OU 1 RI and will anticipate DOE response to this request within the next 30 days.

If you have any questions regarding this matter, please call C. B. Gee of the Remediation Programs Division at extension 5910.



J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

CBG:dmf

Orig. and 1 cc - R. M. Nelson, Jr.

Attachments:  
As Stated (2)

TABLE 1

<u>SAMPLE NUMBER</u>	<u>DATE SHIPPED</u>	<u>ANALYSIS RECEIVED</u>
BH0006EB	September 24, 1991	January 8, 1992
BH0007EB	August 7, 1991	not by February 12, 1992
BH0008EB	September 24, 1992	January 8, 1992
BH00012EB	August 9, 1992	not by February 12, 1992